



Steven F. Molo
MoloLamken LLP
430 Park Avenue
New York, NY 10022
T: 212.607.8160
F: 212.607.8161
smolo@mololamken.com

November 29, 2021

VIA CM/ECF

Hon. Alison J. Nathan
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Red Tree Investments, LLC v. Petróleos de Venezuela, S.A. et al.*,
Nos. 19 Civ. 2519 and 19 Civ. 2523 (S.D.N.Y.): Notice Under Rule 3(H)

Dear Judge Nathan:

We represent Red Tree. We respectfully write under Rule 3(H) of this Court's individual practices in civil cases to alert the Court that 90 days have passed since Red Tree's summary judgment motions were fully briefed.

Red Tree's summary judgment motions, which were initially filed in New York state court in February 2019, *see* 19 Civ. 2519, Dkt. 1; 19 Civ. 2523, Dkt. 5, were fully briefed when Red Tree submitted its reply briefs in support of those motions on August 30, 2021, *see* 19 Civ. 2519, Dkt. 124; 19 Civ. 2523, Dkt. 125. Ninety days after August 30, 2021 elapsed yesterday, November 28, 2021.

We appreciate the Court's time and attention to this matter.

Respectfully submitted,

/s/ Steven F. Molo
Steven F. Molo

CC: All counsel of record via CM/ECF